



NSTAR
ELECTRIC

800 Boylston Street, Boston, Massachusetts 02199

Via hand delivery

December 1, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

RE: Double Pole Report, D.T.E. 03-87

Dear Ms. Cottrell:

On behalf of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric, I am submitting NSTAR Electric's company-specific double pole report to the Department of Telecommunications and Energy (the "Department"). This report responds to the June 16, 2005 Hearing Officer Procedural Ruling that established a standardized format for the filing of semi-annual reports, as required pursuant to Report to the Legislature on Double Poles, D.T.E. 03-87, at 15-16 (2003). The Hearing Officer's June 16th ruling set forth a six-month reporting schedule for NSTAR Electric, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Verizon Massachusetts and Western Massachusetts Electric Company (together, the "Pole Owners") to file statewide information on the status of backlog and new double poles, as well as the submission of company-specific information regarding the progress of the individual Pole Owners in relation to their compliance plans.

Subsequent to the June 16th ruling, the Pole Owners requested a technical conference to discuss the standardized reporting format with the Department. The Hearing Officer granted this request and a technical conference was held on July 19, 2005. Since that date, the Pole Owners have worked diligently with InQuest Technologies to redesign and develop the PLM System in order to meet the Department's reporting requests. Using information and discussions from the technical conference and the Pole Owners' ongoing collaborations, the Pole Owners filed a Joint Motion to Modify the Department's June 16th Procedural Ruling on August 10, 2005. After additional consultations with the Department, on August 31, 2005, the Pole Owners filed an Amended Joint Motion clarifying the standardized format to be used for semi-annual reports on double poles. The Hearing Officer approved the Joint Motion on September 1, 2005 and required the next series of reports to be filed within ninety (90) days thereafter. On October 29 and 30, 2005, the Pole Owners' modifications to the PLM database were finalized.

In accordance with the Hearing Officer's September 1st order, NSTAR Electric files this company-specific description of the status of double-pole sets within the

NSTAR Electric service territory and outlines the actions being taken by the Company to address double poles.

- **Background**

On January 27, 2004, NSTAR Electric submitted its Plan ("2004 Plan") for eliminating the backlog of double utility poles to the Department pursuant to D.T.E. 03-87. In its 2004 Plan, the Company proposed to eliminate its existing backlog of double poles and to streamline the process of installation of new poles to ensure that double poles are removed in a timely manner in the future by:

1. Eliminating the current backlog of double pole sets within three years;
2. Managing the Pole Lifecycle Management ("PLM") system database with other utilities to ensure that accurate information regarding double pole sets is reflected and that pole tenants are notified when they are "next in line" for moving their facilities from the old pole to the new pole in a set;
3. Dedicating work crews to eliminate the backlog, based on prioritization;
4. Prioritizing the elimination of double pole sets by first removing pole sets in communities with the highest volume of sets; and
5. Holding NSTAR Electric regional directors accountable for daily management of the PLM database and the elimination of the double pole backlog.

Consistent with the 2004 Plan, the Company has worked to eliminate the backlog of double-poles sets and to minimize new double-pole sets. Because of ongoing work between the Pole Owners and the continuing refinement of the PLM system, the process of notifying pole tenants of their responsibility to move their attachments is being initiated more quickly, which has resulted in the process having a steady reduction in the backlog. The Company is proactively managing the attachments of third parties to ensure the cooperation of all parties in the efficient removal of double-pole sets. To this end, NSTAR Electric, Verizon, Comcast and RCN meet regularly to discuss double poles and other issues within their respective service territories. Moreover, the Company has internal double pole reduction team meetings and NSTAR Electric, Verizon and the other Pole Owners conduct monthly task force meetings to review and assess ongoing tracking and removal efforts. NSTAR Electric has also maintained its use of area-specific crews for wide-scale removal of double poles within defined municipalities with higher concentrations of double-pole sets. The Company has had significant success with these area-specific crews. These combined actions have resulted in the efficient reduction and management of double-pole sets within the NSTAR Electric service territory, both in the field and administratively.

- **Joint Report**

On this date, in compliance with the Hearing Officer's September 1, 2005 approval of the Pole Owners' Joint Motion regarding the standardized formatting of

double pole reports, NSTAR Electric, with other Pole Owners, have submitted a Joint Report detailing the status of existing double-pole sets in the Commonwealth as of November 1, 2005. It is apparent from this Joint Report that the Pole Owners and third party attachers are making important strides in the management and removal of double-pole sets. However, because of continued growth in the distribution system, the addition of new infrastructure projects and the expanding nature of users seeking to attach their facilities to utility poles, the placement of new poles continues to increase. At the same time, complications in coordinating the transfer of facilities off of double poles among a multitude of attachers with differing rights and interests constrain the pace with which double-pole sets can be removed. NSTAR Electric and the Pole Owners are working collaboratively on an ongoing basis to address these issues.

- **Current Status for NSTAR Electric**

Attached to this NSTAR Electric-specific report is the summary data from the PLM system for Double Pole Activity for the time period January 1, 2005 through November 1, 2005 on an NSTAR Electric system-wide basis. With regard to NSTAR Electric's ongoing program to eliminate the backlog of double-pole sets placed prior to January 2004, the Company has developed a strategy that will:

- Complete the remaining 1,175 transfers;
- Remove those double poles that have been identified as "ready for removal";
- Continue "chunking"¹ poles where appropriate; and
- Coordinate with the Pole Owners and other utilities.

The Company has made significant progress and has removed 9,372 (or 62 percent) of backlog double-pole sets within its service territory. Of the remaining 5,637 backlog double poles, NSTAR Electric has already removed its facilities from nearly 80 percent of those poles, awaiting the transfer of other attachers before removal can be effected. For this reason, continued coordination and collaboration with the other Pole Owners and utilities is essential to ensure additional progress in eliminating the backlog of double poles.

The NSTAR Electric-specific report also indicates that 3,655 double poles have been removed and 2,839 new double poles have been set in the NSTAR Electric service territory. Additionally, since January 1, 2005, NSTAR Electric has completed 5,099 wire transfers. The overall net result is that, even with the unprecedented rate of new installations, the Company has kept up with these installations and further reduced the

¹ "Chunking" involves the practice whereby NSTAR Electric removes virtually all of an existing old pole when the new replacement pole is placed and the electric facilities are transferred, leaving only an approximately 3-4 foot "stub" braced at the top of the new pole. When the last transfer is completed, the stub is removed, usually by the party making that transfer. This practice expedites the removal of large portions of the pole and generally eliminates the need for NSTAR Electric to return to a particular double-pole set to remove the old pole.

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existing backlog. As of November 1, 2005, there were 10,826 double poles (both backlog and new) in NSTAR Electric's service territories.

NSTAR Electric is committed to working with the Department, Pole Owners and the various attachers to continue to make progress in the removal of double-pole sets. Thank you for your attention to this matter. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Kerry Britland (DR)".

Kerry Britland

cc: William Stevens, Hearing Officer
Ronald LeComte, Electric Power Division

Enclosures



NSTAR
ELECTRIC

800 Boylston Street, Boston, Massachusetts 02199

Double Poles & Transfers – NSTAR System Status
Total Backlog Quantity as of October 31, 2005
(Includes Verizon & NSTAR Poles In NSTAR Territory)
(Source – Double Pole Database)

Action Required	Backlog Quantity 10/31/05
Original Quantity of Backlog Poles	15,009
Backlog Poles Completed	9,372 (62%)
Total Backlog Poles Still To Complete	5,637
NSTAR Backlog Transfers to Complete	1,175
NSTAR Backlog Poles Ready for Removal	658

Double Poles & Transfers – NSTAR System Status
Double Pole Reduction Work
Completed January 1, 2005 thru October 31, 2005
(Source – Double Pole Database)

System Improvement Action	Quantity Completed
New Poles Installed Since January 1, 2005	2,839*
NSTAR Transfers Completed	5,099
Double Poles Removed	3,655*

* Includes Both NSTAR and Verizon

**Double Poles & Transfers – NSTAR System Status
Total Work Load Quantity as of October 31, 2005
(Includes Backlog and New Poles)
(Source – Double Pole Database)**

Ball-In-Court Action Required	Total Quantity 10/31/05
NSTAR Transfers	3,103
Other Utility Transfers	6,308
NSTAR - Double Poles "Ready for Removal"	1,101
Other Utility – Double Poles "Ready for Removal"	314
Total Double Poles With Action Required	10,826